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OFFICE OF THE
EXECUTIVE SECRETARY

June 22, 1999

Mr. David Waddell - Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

99-00429

RE: IntraLATA Presubscription (ILP) Plan Filing Pursuant to The Tennessee
Regulatory Authority April 5, 1999 Letter-Revised

Dear Mr. Waddell:

Please find a revised intraLATA presubscription plan (ILP) for LCI International Telecom Corp. (d/b/a Qwest Communications Services). Please substitute this plan for the plan filed on May 14 per a conversation today with Mr. Carsie Mundy of the Telecommunications Division.

LCI is a certificated provider of resold competitive local exchange services in Tennessee (Docket No. 96-00783, released May 30, 1996). LCI is currently providing only resold local exchange services to a small number of customers. LCI does not currently provide facilities-based local exchange services. Accordingly, LCI is completely dependant upon the underlying provider (in this case Bell South) for its implementation and compliance with ILP within the State of Tennessee.

If you have any questions regarding this matter, please do not hesitate to contact me at (703) 363-4866.

Respectfully,


J. Scott Nicholls
Sr. Manager, State Government Affairs

Cc: Mr. Carsie Mundy

Attachment - REVISED ILP plan

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INTRALATA TOLL DIALING
PARITY PLAN
- OFFICE OF THE
EXECUTIVE SECRETARY
TENNESSEE

LCI International Telecom Corp. (d/b/a Qwest
Communications Services)

99-00429

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I. PURPOSE

The intent of this Plan is to provide a proposal that, upon implementation, would provide customers the ability to select the telecommunications carrier of their choice for routing of their intraLATA toll calls.

II. GEOGRAPHIC AVAILABILITY

IntraLATA presubscription (ILP) is available in all LATAs where the Company provides its local resold services within Tennessee. Specifically, since LCI resells the underlying local exchange services of Bell South in Tennessee, it will be providing ILP in all Bell South exchanges.

III. IMPLEMENTATION SCHEDULE

ILP is immediately available in all areas currently served by LCI, or no later than 30 days following approval of the plan by the Commission or July 22, 1999 whichever is sooner.

IV CARRIER SELECTION PROCEDURES

LCI will implement the full 2-PIC carrier selection methodology (or the methodology that the underlying carrier LCI resells has implemented). LCI provides its local exchange services on a resold basis using the underlying facilities of local exchange carriers. As such, LCI must submit all interexchange carrier ("IXC") requests and customer (i.e. end user) requests for ILP to the underlying local exchange carrier for implementation. With the full 2-PIC methodology, customers will be able to presubscribe to one telecommunications carrier for interLATA toll calls and presubscribe to the same or different participating telecommunications carrier, including LCI, for all intraLATA calls.

Accordingly, existing customers may either contact LCI business offices directly to request a change in their ILP carrier, or they may contact their IXC of choice directly, who in turn will contact LCI. Upon receipt of the ILP request, LCI will forward that request to the underlying carrier for processing.

LCI is no longer marketing its resold local exchange services and thus does not anticipate accepting any new resold local exchange customers. However, should a new customer switch to LCI's resold local exchange services, LCI will notify that customer when they sign up that they have the option to select their ILP carrier. New customers who make no PIC will be considered a "no-PIC" and will be required to dial an access code to make intraLATA call. Existing LCI customers who do not choose their ILP carrier will remain with their existing ILP provider until an affirmative selection is made by the customer.

Customers will be notified that they have a 90-day grace period to make a free intraLATA presubscription selection. New customers or existing customers adding new lines will have 30 days to make a free intraLATA presubscription selection. There will

not be a \$5.00 per line charge for initial PIC selections made within the applicable day grace periods.

LCI will not market intraLATA PIC freezes before or during the 90-day grace period, by will provide them if requested.

LCI will comply with the FCC and Commission rules regarding PIC freeze removal. LCI will also comply with Rule 1220-4-2-.56 regarding verification orders for changes by local and long distance telecommunications carriers and 1220-4-2-.58 regarding billing requirements for charges on consumers telephone bills. LCI will not impose carrier-to-carrier penalties for unauthorized intraLATA toll provider changes. In addition, LCI will accept three way calls to remove PIC freezes.

Further, LCI will comply with all rules of the FCC and the Tennessee Regulatory Authority.

V. CUSTOMER EDUCATION/NOTIFICATION

LCI will notify its existing customer base via a bill message and/or bill insert of their ability to choose an ILP carrier with instruction to contact either the IXC directly or the LCI business offices upon approval of this plan by the Commission. Should LCI obtain any new customers, they will be provided this information at the time they sign up for services. As noted in IV. above, customers will be notified of the applicability of all PIC change charges.

VI. CARRIER NOTIFICATION

IXC's will be notified via letter that they must contact LCI directly if an end user using LCI resold local services wishes to change to that IXC. LCI will obtain a list of current IXCs from the Commission for mailing to all currently certificated IXCs.

VII. ACCESS TO OPERATOR SERVICES AND DIRECTORY ASSISTANCE

Access to operator services and directory assistance will be available through the customer's local carrier (LCI), its interLATA carrier or intraLATA carrier. LCI will provide non-discriminatory access to telephone numbers (if applicable), directory assistance (if applicable) and directory listings (if applicable). LCI provides local exchange on a resale basis and is reliant on the underlying carrier for the provision of the services. LCI does not maintain its own telephone number database.

For operator services, customers dial "0" to reach their (in this case the underlying local exchange carrier since LCI is reselling the service) local exchange operator and "00" to reach their interLATA operator. For Directory Assistance, customers dial "411" for access local directory assistance or 1 NPA 555 1212 to reach their interLATA carrier for directory assistance.

VIII. COST RECOVERY

LCI will not seek any cost recovery for implementation of ILP as it is providing services as a reseller and thus relies on the underlying facilities-based carrier for implementing changes in ILP providers which LCI submits to the underlying carrier. Accordingly, LCI is not filing a plan for cost recovery.